ATTACHMENT A

THIS ATTACHMENT IS BEING FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

ATTACHMENT B

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ATTACHMENT C

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ATTACHMENT D

David E. Young
Vice President-
Industry Markets

SBC Telecommunications, Inc.
Four Bell Plaza, Room 640
311 S. Akard
Dallas, Texas 75202-5398
Phone 214 464-1068
Fax 214 858-0281

SBC

April 11, 2000

Mrs. Sarah DeYoung
Division Manager – Local Services and Access Management
AT&T
795 Folsom Street, Room 506
San Francisco, CA 94107

Dear Sarah,

This is a response to your letter dated April 10, 2000 and an attempt to clarify any misunderstandings that may have arisen from our meeting last week. While I did agree that there have been concerns about our FDT process, my focus, at our meeting, was on the California situation where we did experience difficulties. However, in Texas, our FDT process appears to be stable. If I left another perception, please forgive me.

The FDT failure rate experienced during the month of March in California was due to a software problem that has been corrected. I have been assured that this problem should not arise again. Therefore, I would encourage your use of the FDT process.

I would also like to follow up on AT&T's offer to provide a list of key central office locations. In our February 3, 2000 meeting, this list was promised as a means of cooperatively working on this concern.

I hope this clears up any confusion from our discussion.

Sincerely,

ATTACHMENT E

Sarah DeYoung
Region Vice President
Local Services Organization
Pacific Region

Room 508
795 Folsom Street
San Francisco, CA 94107
Phone: 415 442 5508
Fax: 415 442 3683

April 10, 2000

Mr. Dave Young
Vice President -Industry Markets
SBC Corp.
311 S. Akard
Dallas, Texas 75202

Dear Dave,

I'm writing because I seek your immediate assistance in reconciling the conflicting statements that your company has been making about the FDT process. On the one hand, SBC has said that "reliable, timely, and outage-free service can be expected with either" the FDT or the CHC process. Conway/Dysart Affidavit attached to SBC's Supplemental Submission to the FCC dated April 5, 2000, ¶ 34. In addition, at the CLEC User Forum meeting on April 6 (attended by Walt Willard and Mark Van De Water of my organization), one of SBC's managers in the Local Operations Center, James Ellis, announced that the FDT process was the "way to go." Indeed, at that meeting, James spent a lot of time discussing how well SWBT believes the current FDT process works. At the same time, however, at our meeting on Thursday, you acknowledged that there are substantial problems with SBC's FDT process and urged us not to use the FDT process in either Texas or California until you are able to fix these problems.

In light of these conflicting statements, we are having trouble determining which kind of unbundled loop orders to submit, and our business decisions have thus been hampered by the lack of clarity surrounding your company's position. Please let me know whether I misunderstood your comments at our meeting on Thursday or if you believe that they accurately reflect SBC's position. In addition, if it is your company's recommendation that AT&T refrain from using the FDT process, I would like your agreement to waive the TBCC conversion and manual process charges in California and your assurance that SBC will continue to refrain from imposing the premium charge associated with the CHC process in Texas.

If I do not hear from you in writing by close of business Tuesday, AT&T will assume, based on the statements made by other SBC representatives, that the FDT process is viable, and will begin to resume sending FDT orders.

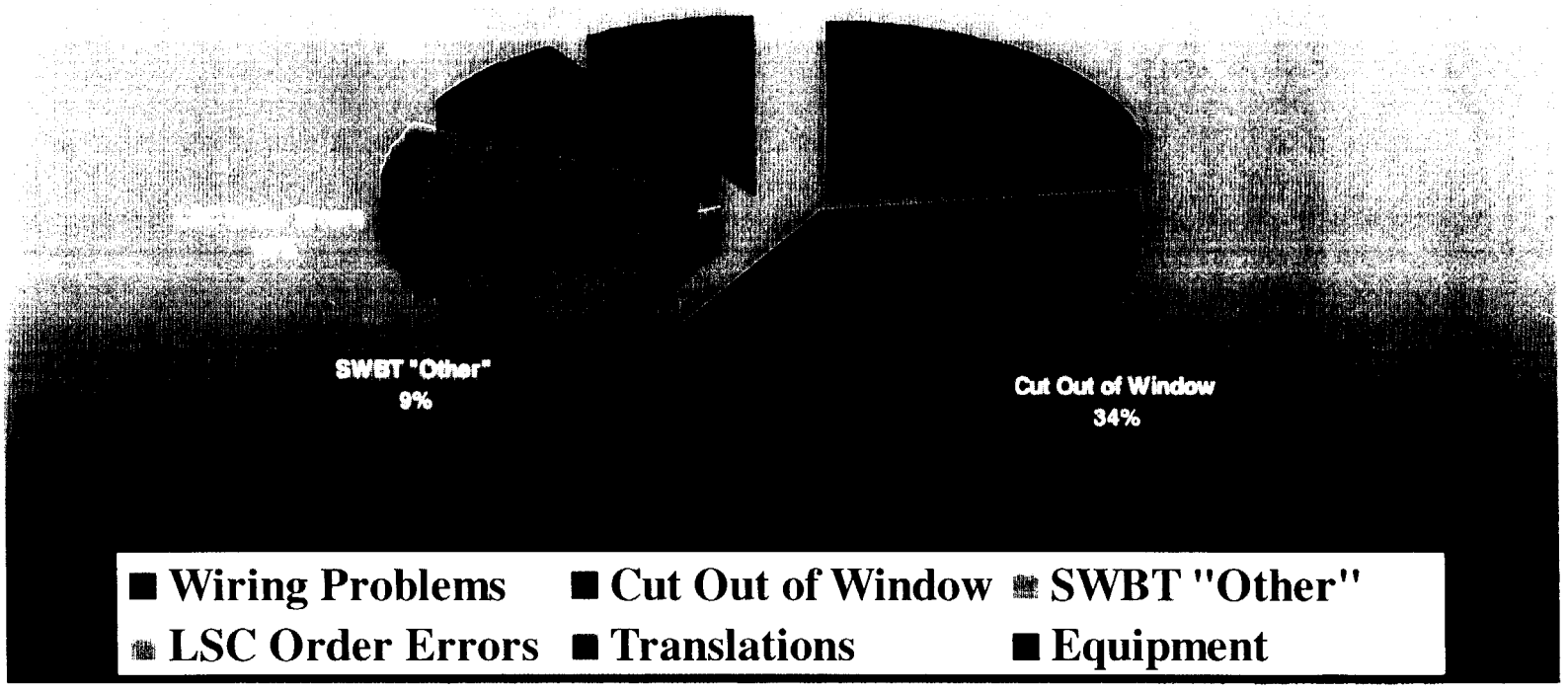
Sincerely,

Sylvia Fottenberg for Sarah DeYoung

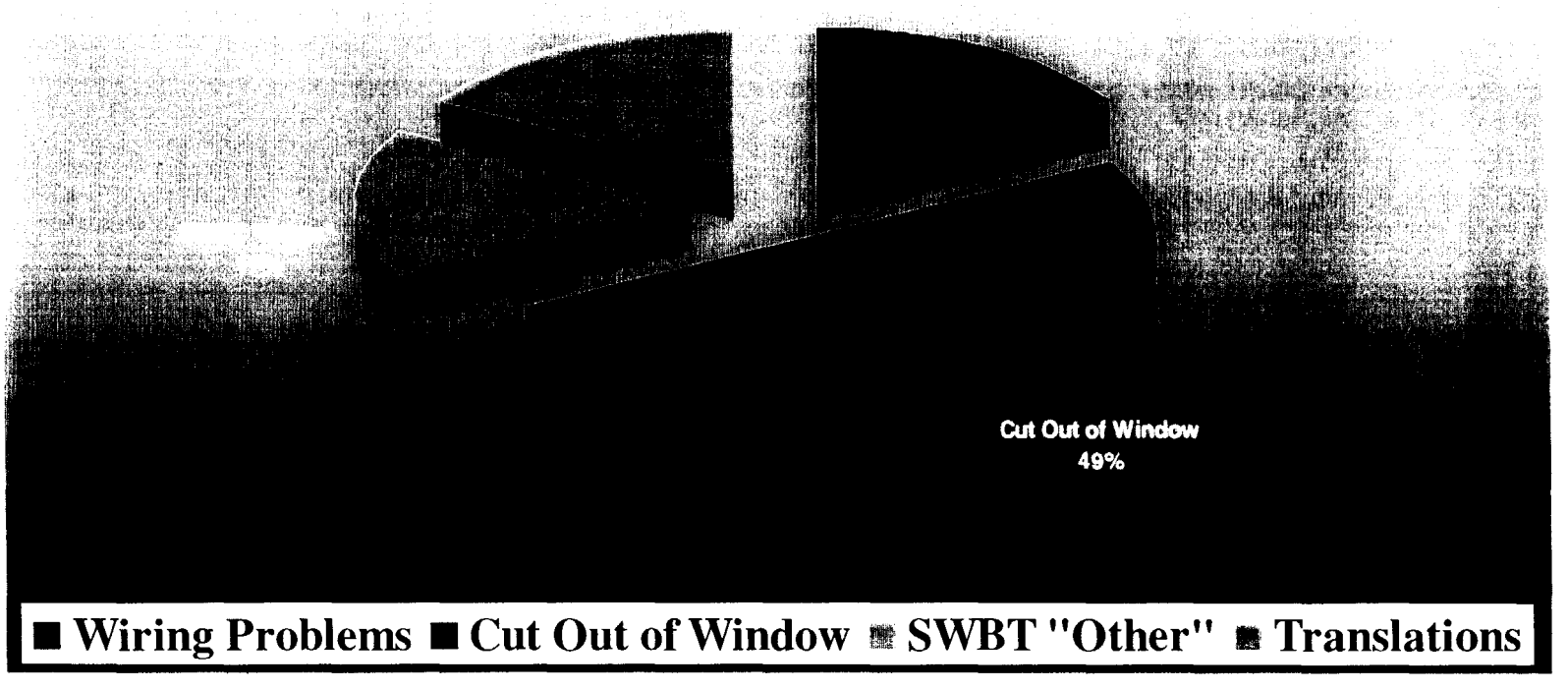
Sarah DeYoung
Division Manager – Local Services and Access Management

ATTACHMENT F

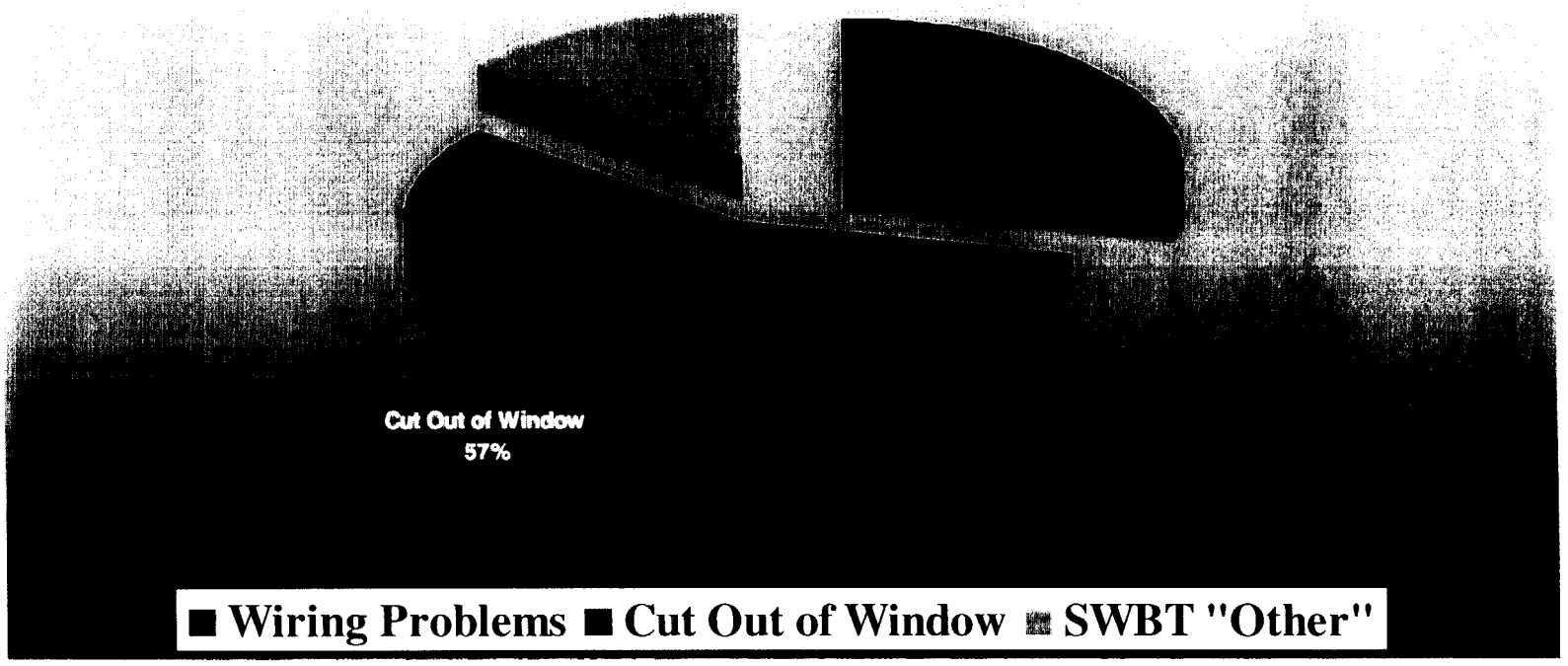
SWBT
December through February
FDT & CHC Orders
(Without SOAC)
Root Cause Outage Analysis



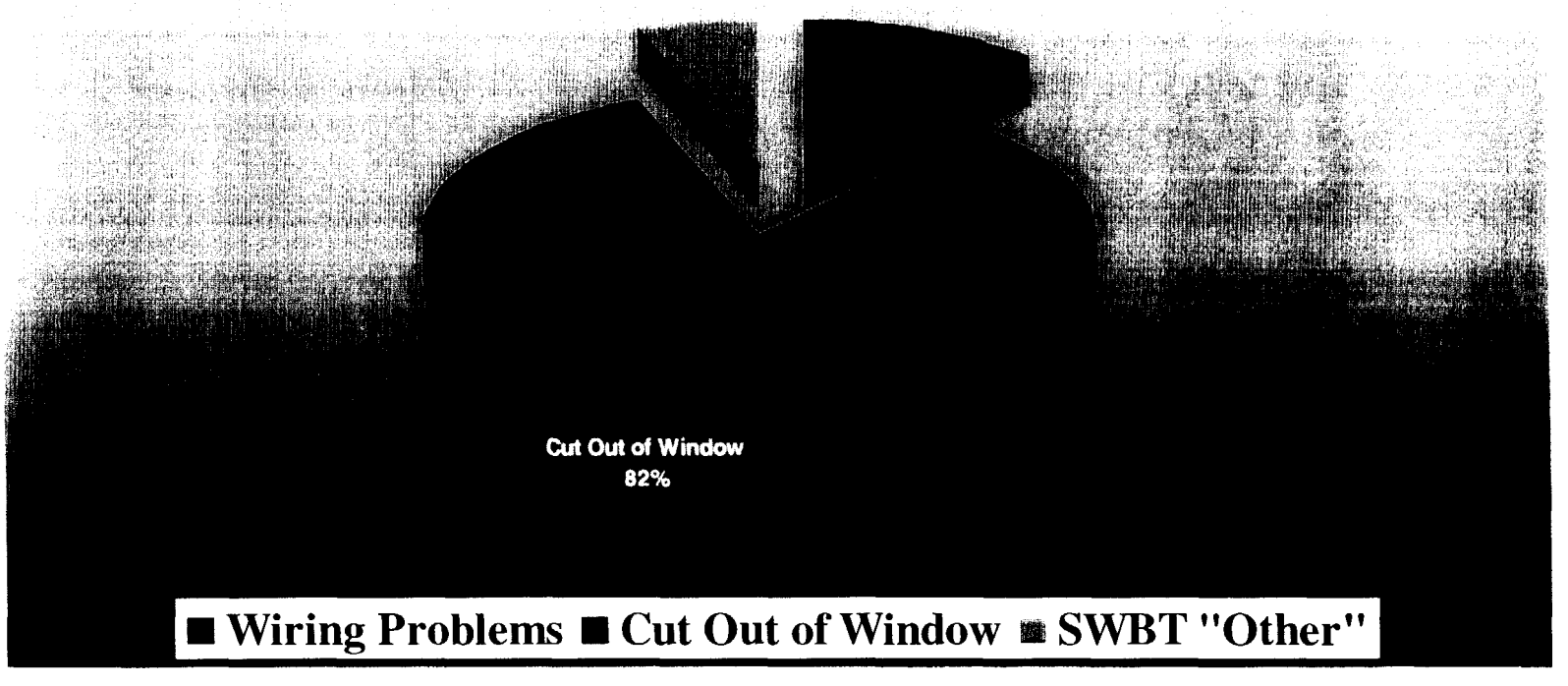
SWBT
December CHC Orders
Root Cause Outage Analysis



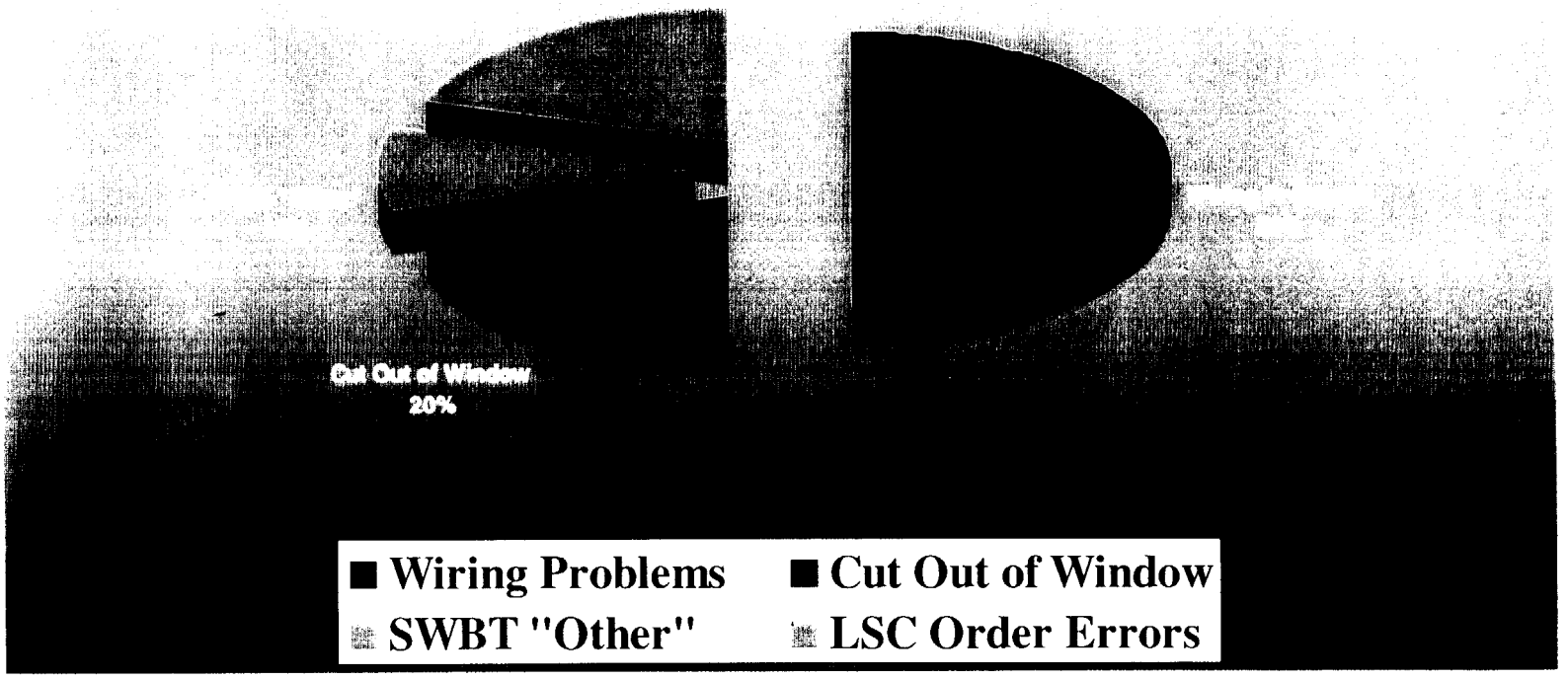
TCG/SWBT
February CHC Orders
(Without SOAC)
Root Cause Outage Analysis



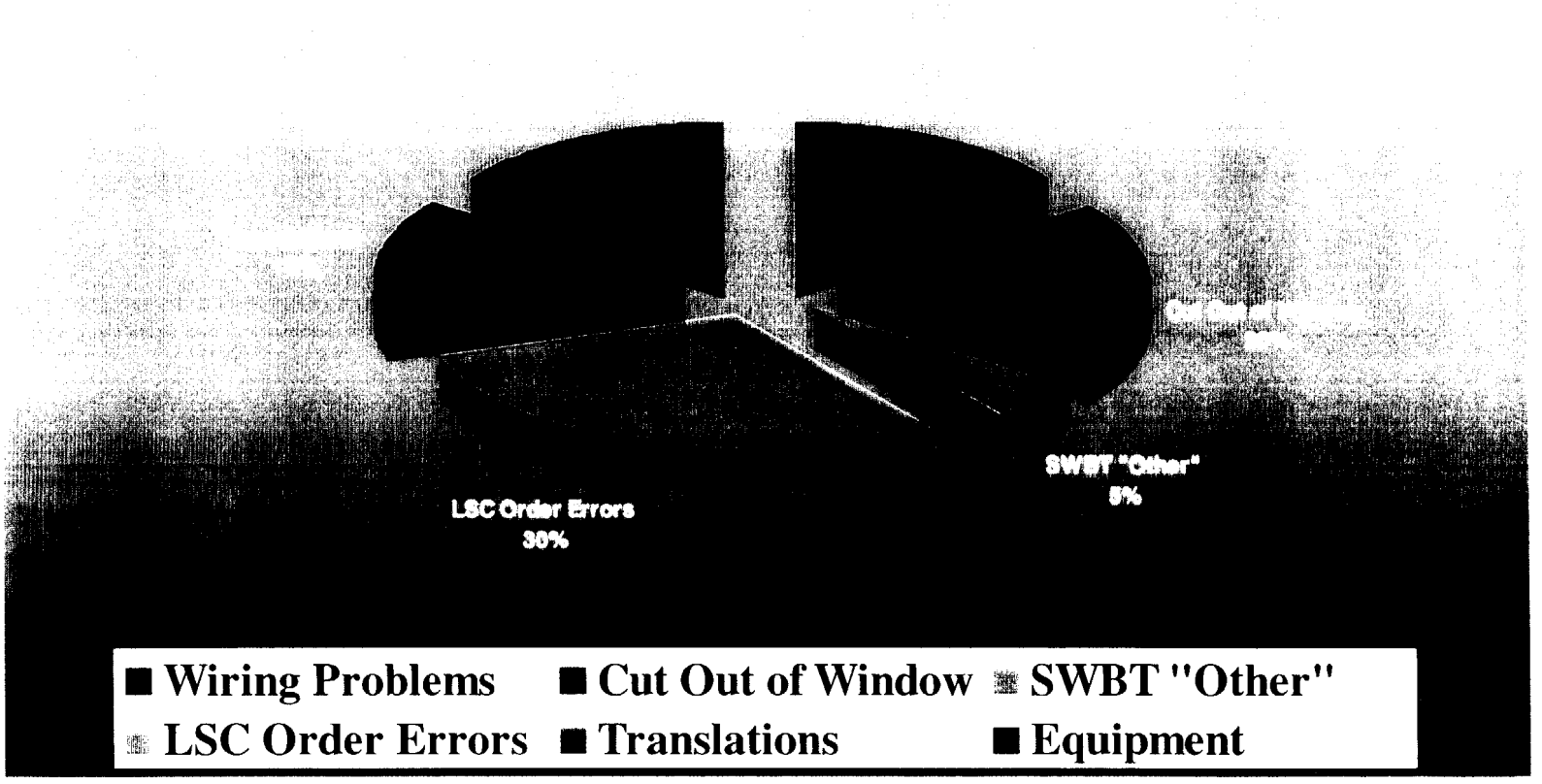
TCG/SWBT
February CHC Orders
(With SOAC)
Root Cause Outage Analysis



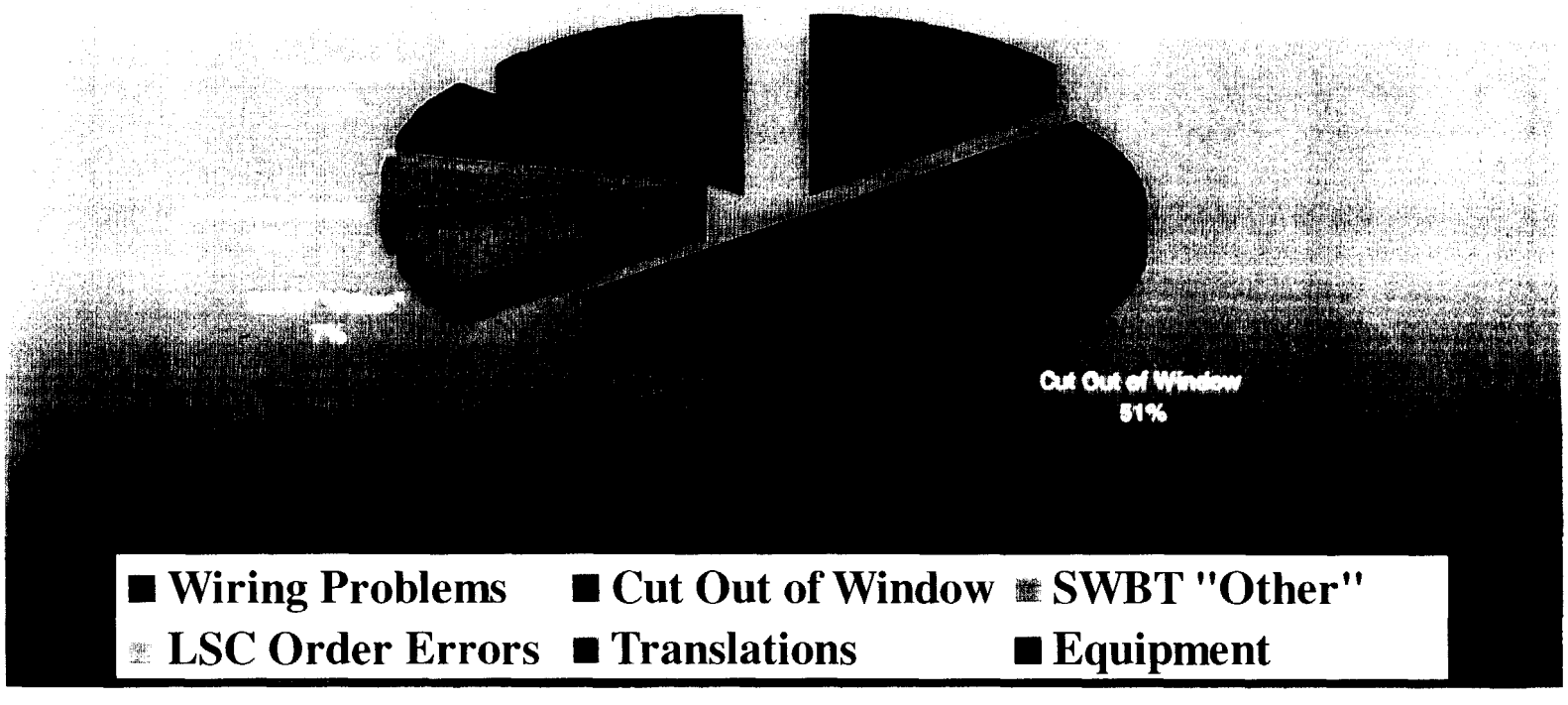
SWBT
December FDT Orders
Root Cause Outage Analysis



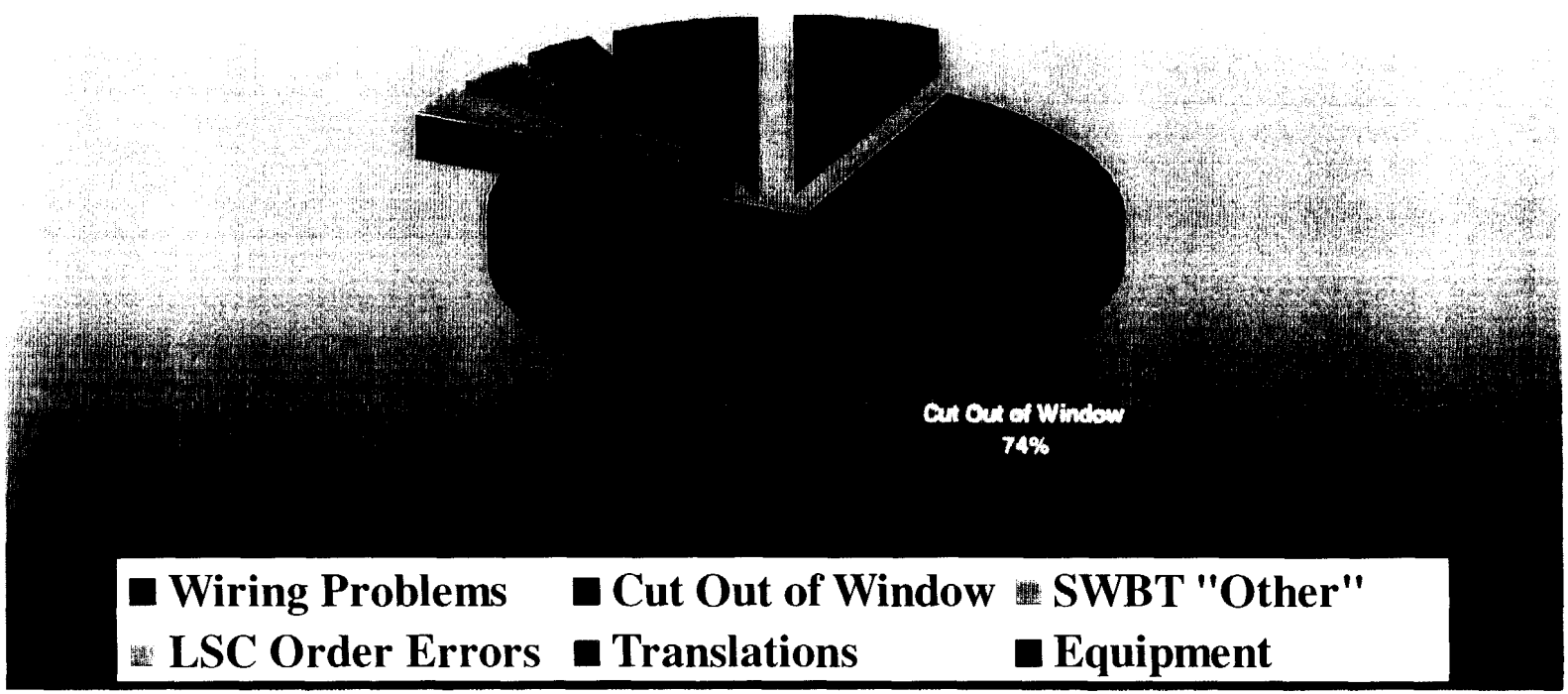
TCG/SWBT
January FDT Orders
Root Cause Outage Analysis



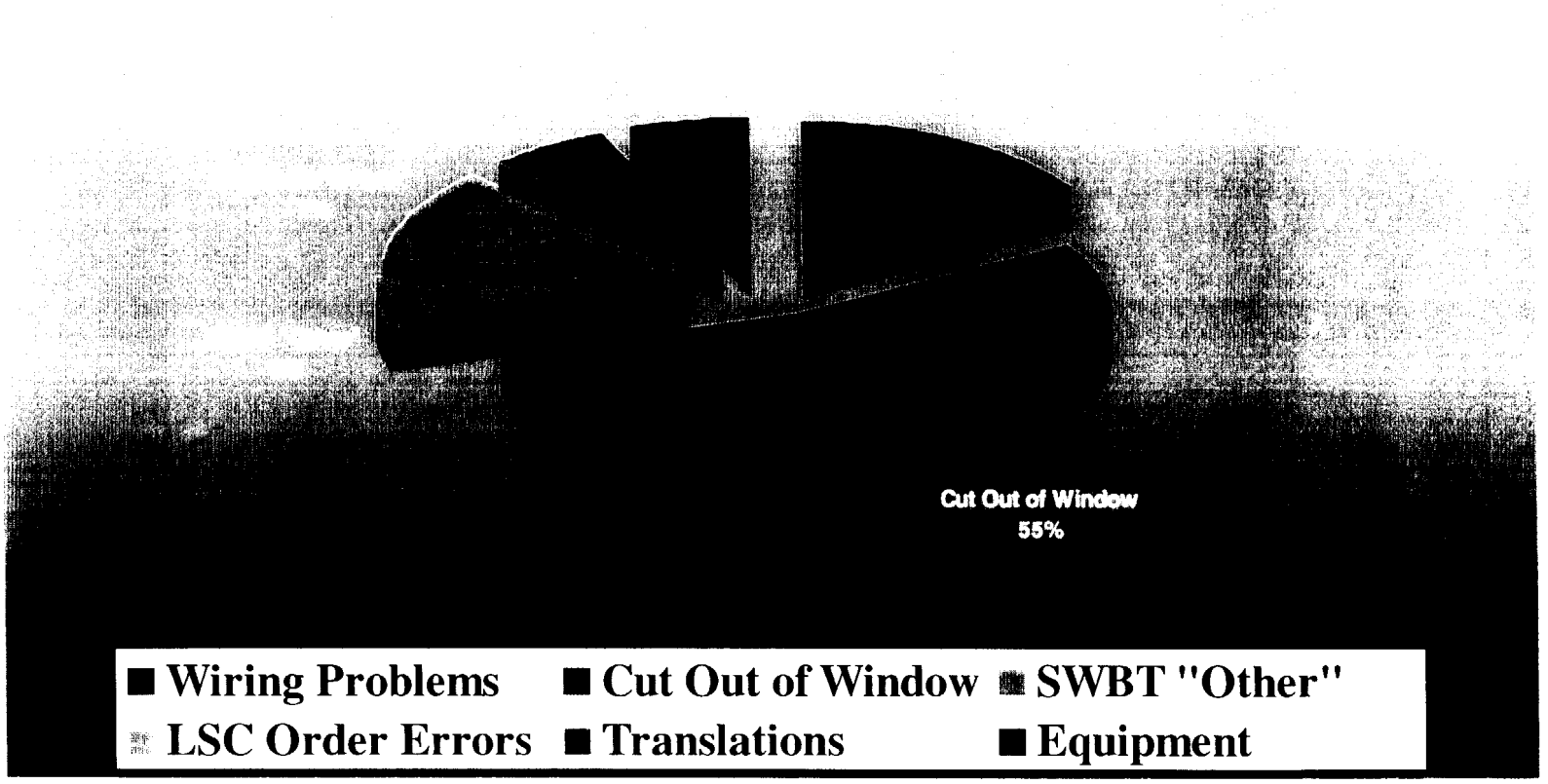
TCG/SWBT
February FDT Orders
(Without SOAC)
Root Cause Outage Analysis



TCG/SWBT
February FDT Orders
(With SOAC)
Root Cause Outage Analysis



SWBT
December through February
FDT & CHC Orders
(With SOAC)
Root Cause Outage Analysis



ATTACHMENT G

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ATTACHMENT I

114. Measurement

Percentage of Premature Disconnects for CHC/FDT LNP with Loop Orders. ~~(Coordinated Cutovers)~~

Definition:

Percentage of CHC/FDT LNP with Loop orders ~~coordinated cutovers~~ where SWBT ~~prematurely~~ disconnects the customer prior to the scheduled start time ~~conversion~~.

Exclusions:

- CHC/FDT LNP with Loop orders where the CLEC requests that the cut-over begin prior to the scheduled time.
- ~~None~~

Business Rules:

A premature disconnect occurs any time SWBT begins the cut-over ~~disconnects the CLEC customer~~ more than 10 minutes prior to the scheduled start time. ~~Prior to the CLEC authorization~~.

Levels of Disaggregation:

- Coordinated Hot Cuts (CHC) – LNP with Loop
- Frame Due Time (FDT) – LNP with Loop ~~– None~~

Calculation:	Report Structure:
(Count of prematurely disconnected CHC/FDT LNP with Loop orders ~~customers~~ / total CHC/FDT LNP with Loop orders ~~coordinated conversion customers~~) * 100	Reported by CLEC and all CLECs, ~~Disaggregated by INP and INP with loop, LNP and LNP with loop.~~

Measurement Type:

Tier 1 – High
Tier 2 – High

Benchmark:

≤ 2% ~~or less~~ premature disconnects, ~~starting 10 minutes before scheduled time, FDT is Diagnostic.~~

114.1 Measurement
CHC/FDT LNP with Loop Provisioning Interval.
Definition:
The % of CHC/FDT LNP with Loop orders completed by SWBT within the established provisioning intervals.
Exclusions:
• CHC/FDT LNP with Loop orders with greater than 24 loops (including multiple orders totaling 25 or more lines to the same customer premise on the due date). • CLEC caused delays that do not allow SWBT the opportunity to complete CHC/FDT order within the designated interval.
Business Rules:
The start time is at the direction of the CLEC and based on a negotiated and scheduled time for coordinated hot cut orders (CHC) and on the frame due time for frame due time orders (FDT). For CHC orders, the clock starts when the SWBT technician completes the cross connect to the CLEC facilities and has called the CLEC to notify that the cut-over has been completed. For FDT orders, the clock starts at the frame due time and ends when the SWBT technician completes the cross connect to the CLEC facilities. This measurement only includes Coordinated Hot Cuts and Frame Due Time orders with 1-24 loops. A conversion with 25 or more lines (including multiple orders totaling 25 or more lines to the same customer premise on the same due date) is considered a project and is negotiated with the CLEC at the time of conversion.
Levels of Disaggregation:
CHC LNP with loop • < 10 lines • 10-24 lines FDT LNP with loop • < 10 lines • 10-24 lines

Calculation:	Report Structure:
Total CHC/FDT LNP with Loop orders within the designated interval ÷ total CHC/FDT LNP with Loop orders.	Reported by CLEC and all CLECs.

Measurement Type:
Tier 1 – Medium Tier 2 – Medium
Benchmark:
CHC/FDT orders for < 10 loops 90 % within one hour. CHC/FDT orders for 10-24 loops 90% within two hours.

115. Measurement	
~~Percentage of SWBT caused delayed Coordinated Cutovers~~ Percent Provisioning Trouble Reports (PTR).	
Definition:	
Measures the percent of CHC/FDT circuits for which the CLEC submits a trouble report on or before noon on the next business day after conversion. ~~Percentage of SWBT caused late coordinated cutovers in excess of "x" (30, 60 and 120) minutes.~~	
Exclusions:	
~~None~~Reports for which the trouble is attributable to the CLEC or its end user.	
Business Rules:	
~~A coordinated cutover is delayed if SWBT is not ready within "x" (30, 60, and 120) minutes after the frame due time.~~ The percent of CHC/FDT circuits for which the CLEC submits a trouble report on or before noon on the next business day after conversion.	
Levels of Disaggregation:	
CHC and FDT	
Calculation:	**Report Structure:**
(Count of ~~SWBT~~ CHC/FDT circuits for which the CLEC submits a trouble report on or before noon on the next business day after conversion ÷ total # of CHC/FDT circuits converted. ~~Caused late coordinated cutovers in excess of "x" (30, 60 and 120) minutes = total coordinated cutovers) * 100~~	Reported by CLEC and all CLECs. ~~disaggregated by INP and INP with loop, LNP and LNP with loop.~~
Measurement Type:	
Tier 1 – ~~Low~~High Tier 2 – ~~None~~ High	
Benchmark:	
~~8% or less of SWB coordinated conversions beyond 30 minutes, 2% beyond 1 hour from scheduled time or 1% beyond 2 hours.~~ 5 % or less CHC/FDT trouble reports on or before noon on the next business day after conversion.	

115.1 Measurement - New	
Mean Time To Restore – Provisioning Trouble Report (PTR)	
Definition:	
Average duration of the outage from the receipt of PTR to the time it is cleared.	
Exclusions:	
• Excludes Non-measured reports (CPE, Interexchange, and Information reports.) • Excludes no access and delayed maintenance.(e.g.	
Business Rules:	
The start time is when the report is received. The stop time is when the report is cleared.	
Levels of Disaggregation:	
• CHC and FDT	
Calculation:	**Report Structure:**
Σ[(Date and time PTR is closed with the customer) - (date and time PTR is received)] – total PTRs.	Reported by CLEC, all CLECs.
Measurement Type:	
Tier 1 – Medium Tier 2 – Medium	
Benchmark:	
Parity:	Retail Comparison
1 8.0 dB Loop with Test Access and 8.0 dB Loop without Test Access	POTS (Res/Bus) POTS (Res/Bus NFW) -- excludes "C" orders with only features and supercedes
2. 5.0 dB Loop with Test Access and 5.0 dB Loop without Test Access	Parity with SWBT Non-Switched VGPL